

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

In re: § Case No. 23-11007-cgb
ARTIUSID, INC., § § Chapter 7
Alleged Debtor. § §

**MOTION TO EXPEDITE CONSIDERATION OF
EMERGENCY MOTION FOR PROTECTIVE ORDER AND
TO QUASH DEBTOR'S NOTICES OF DEPOSITION**

TO THE HONORABLE CHRISTOPHER G. BRADLEY,
UNITED STATES BANKRUPTCY JUDGE

Collaborative Vision LLC (“Collaborative Vision”), a Creditor in the above-referenced bankruptcy proceeding (the “Bankruptcy Proceeding”) and Lisa Mater whose deposition has been noticed file this *Motion to Expedite Consideration of Emergency Motion for Protective Order and to Quash Debtor's Notices of Deposition* (the “Motion to Expedite”) as follows:

1. **Underlying motion:** Collaborative Vision’s *Emergency Motion For Protective Order and to Quash Debtor’s Notices of Deposition* (“Motion to Quash”) (Dkt. No. 106) seeks entry of an Order from the Court to quash the Notices of Deposition (as defined in the Motion to Quash) that Debtor artruis.iD, Inc. f/k/a Q5iD, Inc.’s (“Debtor”) served setting the depositions of Collaborative Vision and Lisa Martar on September 18, 2024, in Portland, Oregon.
2. **Need for expedited consideration:** The Notices of Deposition were served on Friday, September 13, 2024, just five days before the depositions are to take place, and the topics listed in the deposition are not relevant to the case at hand. Accordingly, there is insufficient time to consider the Motion to Quash under ordinary deadlines prior to the deposition date.
3. **Certificate of conference:** The undersigned counsel for Collaborative Vision and Lisa Martar has conferred with counsel for the Debtor by email regarding the Motion to Quash and expedited consideration. As of this filing, Debtor’s Counsel has stated that they are not sure whether they are opposed to the Motion to Quash. They have not indicated their availability for a hearing on the Expedite Motion or Motion to Quash.
4. **Time estimate for hearing:** Collaborative Vision anticipates the hearing on the Motion to Quash will take approximately 15-30 minutes.

5. **Deadline for when consideration or hearing is needed:** Tuesday, September 17, 2024.
6. **Dates when all parties are available:** Counsel for Collaborative Vision requests the Court consider the Motion to Quash on the morning of September 17, 2024 as counsel for Collaborative Vision and Ms. Matar is unavailable on the afternoon of September 17, 2024. Counsel for Collaborative Vision would respectfully request a telephonic hearing due to Lisa Martar residing in Oregon.

WHEREFORE, Collaborative Vision respectfully requests that the Court expedite consideration of the Motion to Quash and set it for a telephonic hearing at the Court's earliest convenience on September 16 or 17.

Dated: September 16, 2024

Respectfully Submitted,

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Attorneys for Collaborative Vision LLC

CERTIFICATE OF SERVICE

I do hereby certify that on September 16, 2024, the undersigned counsel served a true and correct copy of this Motion to Expedite through the Court's CM/ECF system on all parties enlisted to receive service electronically, as set out on the list below.

/s/ Lynn Hamilton Butler
Lynn Hamilton Butler

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